

LITE DePALMA GREENBERG, LLC

Bruce D. Greenberg
Two Gateway Center, Suite 1201
Newark, New Jersey 07102-5003
Tel: (973) 623-3000
Fax: (973) 623-0858
bgreenberg@litedepalma.com
jshooman@litedepalma.com

Attorneys for Plaintiffs and the Class

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE NEW JERSEY TAX SALES
CERTIFICATES ANTITRUST LITIG.

Master Docket No. 3:12-CV-01893-MAS-TJB

**NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF
SETTLEMENT, PRELIMINARY
CERTIFICATION OF SETTLEMENT
CLASS, APPOINTMENT OF INTERIM
CLASS COUNSEL AS SETTLEMENT
CLASS COUNSEL, AND DEFERRAL OF
CLASS NOTICE**

TO: ALL COUNSEL IN THE CAPTIONED MATTER

PLEASE TAKE NOTICE that on June 17, 2013 at 9:00 am, or as soon thereafter as counsel may be heard, Plaintiffs will move before the Honorable Michael A. Shipp, U.S.D.J., at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, for an order granting preliminary approval of settlement, preliminary certification of settlement class, appointment of Interim Class Counsel as Settlement Class Counsel, and deferral of class notice.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs will rely upon the accompanying Memorandum of Law and Declaration of Seth Gassman, with attached exhibits. A proposed form of Order is also submitted herewith.

Dated: April 4, 2013

LITE DePALMA GREENBERG, LLC

/s/ Bruce D. Greenberg

Bruce D. Greenberg
Two Gateway Center, Suite 1201
Newark, New Jersey 07102-5003
Tel: (973) 623-3000
Fax: (973) 623-0858
bgreenberg@litedepalma.com

Interim Liaison Counsel

HAGENS BERMAN SOBOL SHAPIRO LLP

Steve W. Berman (admitted *pro hac vice*)
1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
Tel: (206) 623-7292
Fax: (206) 623-0594
steve@hbsslaw.com

HAGENS BERMAN SOBOL SHAPIRO LLP

Jason A. Zweig (admitted *pro hac vice*)
555 Fifth Avenue, Suite 1700
New York, NY 10017
Tel: (212) 752-5455
Fax: (917) 210-3980
jasonz@hbsslaw.com

HAUSFELD LLP

Michael D. Hausfeld (admitted *pro hac vice*)
James J. Pizzirusso (admitted *pro hac vice*)
Seth R. Gassman (admitted *pro hac vice*)
1700 K Street, NW, Suite 650
Washington, DC 20006
Tel: 202-540-7200
Fax: 202-540-7201
mhausfeld@hausfelldllp.com
jpizzirusso@hausfelldllp.com
sgassman@hausfelldllp.com

Interim Class Counsel